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10 UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

11 REFLEX MEDIA, INC., a Nevada
12 corporation,

13 Plaintiff,

14 v.

15 MARIA DEL MAR MARTINEZ
16 SANCHEZ, an individual, FDS
SOLUTIONS LIMITED d/b/a
17 fndrtsmt.com, a United Kingdom
company; and Does 1-10, inclusive,

18 Defendants.

} Case No. 2:17-cv-00491-FMO (JPRx)
} Before the Hon. Fernando M. Olguin

}
} **RESPONSES OF DEFENDANTS**
} **MARIA DEL MAR MARTINEZ**
} **SANCHEZ AND FDS SOLUTIONS**
} **LIMITED TO FIRST SET OF**
} **SPECIAL INTERROGATORIES**

19
20 PROPOUNDING PARTY: PLAINTIFF REFLEX MEDIA, INC.

21 RESPONDING PARTY: DEFENDANTS MARIA DEL MAR MARTINEZ
SANCHEZ AND FDS SOLUTIONS LIMITED

22 SET NUMBER: ONE (1)

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1 Defendants Maria Del Mar Martinez Sanchez and FDS Solutions Limited
2 (“Responding Parties”) submit the following response to the First Set of Special
3 Interrogatories propounded by Plaintiff Reflex Media, Inc., as follows:
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5 **PRELIMINARY STATEMENT**

6 1. Responding Parties have not fully completed the investigation of the facts
7 relating to the case and have not completed preparation for trial. Accordingly, all of
8 the responses contained herein are based only upon such information and documents
9 that are currently available to, and specifically known to, Responding Parties.

10 2. It is anticipated that further discovery, independent investigation, and
11 legal research and analysis will supply additional facts, add meaning to the known
12 facts, and establish entirely new factual conclusions and legal contentions, all of
13 which may lead to substantial additions to, changes in, and variations from the
14 responses set forth herein. The following responses are given without prejudice to
15 Responding Parties’ right to produce evidence of any subsequently discovered fact or
16 facts that Responding Parties may later recall.

17 3. Responding Parties reserve the right to change or supplement any and all
18 responses herein as additional facts are ascertained, analyses are made, legal research
19 is completed, and contentions are formed. The responses contained herein are made in
20 a good faith effort to supply as much factual information as is presently known, but
21 should in no way be to the prejudice of this party in relationship to further discovery,
22 research, or analysis.

23 4. Responding Parties further assert their rights under the Hague
24 Convention on Taking of Evidence Abroad in Civil or Commercial Matters, all of
25 which rights are expressly reserved.
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1 **OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS**

2 1. Responding Parties object to Paragraph 2 of the Definitions and
3 Instructions as vague, ambiguous, overbroad, burdensome, oppressive, and violative
4 of the attorney-client privilege and the attorney work product doctrine.

5 2. Responding Parties object to Paragraph 12 of the Definitions and
6 Instructions as vague, ambiguous, and overbroad.

7 3. Responding Parties object to Paragraph 14 of the Definitions and
8 Instructions as imposing obligations beyond those required by the Federal Rules of
9 Civil Procedure.

10 **RESPONSES TO SPECIAL INTERROGATORIES**

11 **INTERROGATORY NO. 1:**

12 Identify when DEFENDANTS acquired the following domains:

- 13 - www.findyourtruesoulmate.com
14 - www.fndrsmt.com

15 **RESPONSE TO INTERROGATORY NO. 1:**

16 Responding Parties acquired those domains on October 3, 2014.

17 **INTERROGATORY NO. 2:**

18 List every home and work address (physical address) used by SANCHEZ for
19 the past five years.

1 **RESPONSE TO INTERROGATORY NO. 2:**

2 Responding Parties object to Interrogatory No. 2 as overbroad, not calculated to
3 lead to the discovery of relevant and admissible evidence, not proportional to the
4 needs of the case, and violative of the right to privacy.

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6 **INTERROGATORY NO. 3:**

7 Identify every time DEFENDANTS have been accused of fraudulent billing.

8

9 **RESPONSE TO INTERROGATORY NO. 3:**

10 Responding Parties object to Interrogatory No. 3 as vague, ambiguous,
11 overbroad, not calculated to lead to the discovery of relevant and admissible evidence,
12 not proportional to the needs of the case, and violative of the right to privacy.

13

14 **INTERROGATORY NO. 4:**

15 Describe the nature of all products and/or services offered through
16 www.findyourtruesoulmate.com.

17

18 **RESPONSE TO INTERROGATORY NO. 4:**

19 The domain www.findyourtruesoulmate.com is an online member subscription
20 dating website.

21

22 **INTERROGATORY NO. 5:**

23 Describe the nature of all products and/or services offered through
24 www.fndrsmt.com.

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1 **RESPONSE TO INTERROGATORY NO. 5:**

2 The domain www.fndrsmt.com is the customer service website for
3 www.findyourtruesoulmate.com.

5 **INTERROGATORY NO. 6:**

6 List each website for whom www.fndrsmt.com provides payment processing or
7 payment-related services.

9 **RESPONSE TO INTERROGATORY NO. 6:**

10 None.

12 **INTERROGATORY NO. 7:**

13 Please describe all information DEFENDANTS possess concerning the use
14 and/or ownership of the following email addresses:

- 15 - ceoseekingarrangement@gmail.com
16 - seekingmanagementceo@gmail.com

18 **RESPONSE TO INTERROGATORY NO. 7:**

19 Responding Parties have no information concerning the use or ownership of the
20 specific email addresses. To the extent “DEFENDANTS” is defined to mean former
21 employees, agents, or attorneys of FDS and Sanchez, Responding Parties have no
22 information as to what information, if any, those persons possess concerning those
23 email addresses.

1 **INTERROGATORY NO. 8:**

2 Identify any relationship DEFENDANTS have, or have had, with respect to any
3 of the following companies:

- 4 - Handle Marketing Limited
5 - Ixion Creations Limited

6

7 **RESPONSE TO INTERROGATORY NO. 8:**

8 Responding Parties object to Request No. 8 as vague, ambiguous, overbroad,
9 not calculated to lead to the discovery of relevant and admissible evidence, and
10 violative of the right to privacy.

11

12 **INTERROGATORY NO. 9:**

13 Identify all other websites owned/operated by DEFENDANTS from 2016 to the
14 present.

15

16 **RESPONSE TO INTERROGATORY NO. 9:**

17 Responding Parties object to Request No. 9 as vague, ambiguous, overbroad,
18 not calculated to lead to the discovery of relevant and admissible evidence, not
19 proportional to the needs of the case, and violative of the right to privacy.

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21 **INTERROGATORY NO. 10:**

22 Describe all information DEFENDANTS' possess concerning the origin of the
23 PHISHING EMAIL.

24

25 **RESPONSE TO INTERROGATORY NO. 10:**

26 Responding Parties have no information concerning the origin of the
27 PHISHING EMAIL. To the extent "DEFENDANTS" is defined to mean former

1 employees, agents, and attorneys of FDS and Sanchez, Responding Parties have no
2 knowledge of what information, if any, those persons possess regarding the origin of
3 the PHISHING EMAIL.

4

5 **INTERROGATORY NO. 11:**

6 Identify any relationship DEFENDANTS have ever had with REFLEX and/or
7 SEEKING ARRANGEMENT.

8

9 **RESPONSE TO INTERROGATORY NO. 11:**

10 Responding Parties have had no relationship with REFLEX or SEEKING
11 ARRANGEMENT. To the extent “DEFENDANTS” is defined to include former
12 employees, agents, or attorneys of FDS and Sanchez, Responding Parties have no
13 knowledge as to whether such persons have had any relationship with REFLEX or
14 SEEKING ARRANGEMENT.

15

16 **INTERROGATORY NO. 12:**

17 Identify ever other online dating website affiliated with DEFENDANTS.

18

19 **RESPONSE TO INTERROGATORY NO. 12:**

20 Responding Parties object to Interrogatory No. 12 as vague, ambiguous,
21 overbroad, not calculated to lead to the discovery of relevant and admissible evidence,
22 not proportional to the needs of the case, and violative of the right to privacy.

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24 **INTERROGATORY NO. 13:**

25 Provide a list of every email address that sent a copy of the PHISHING EMAIL.

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1 **RESPONSE TO INTERROGATORY NO. 13:**

2 Responding Parties object to Interrogatory No. 13 as vague, ambiguous, and
3 unintelligible.

4 Without waiving the foregoing objections, Responding Parties respond as
5 follows:

6 Responding Parties have no knowledge of which email addresses sent the
7 PHISHING EMAIL. To the extent “DEFENDANTS” is defined to mean former
8 employees, agents, or attorneys of FDS or Sanchez, Responding Parties have no
9 knowledge of what information, if any, those persons have on this subject.

10

11 **INTERROGATORY NO. 14:**

12 List the officers and directors of FDS SOLUTIONS from January 1, 2016, to
13 the present.

14

15 **RESPONSE TO INTERROGATORY NO. 14:**

16 Maria del Mar Sanchez Martinez.

17

18 **INTERROGATORY NO. 15:**

19 Identify whether SANCHEZ has ever been a member of SEEKING
20 ARRANGEMENT, and if so, the email address(es) given when joining the website.

21

22 **RESPONSE TO INTERROGATORY NO. 15:**

23 SANCHEZ has never been a member of SEEKING ARRANGEMENT.

24

25 **INTERROGATORY NO. 16:**

26 Identify all email addresses used by SANCHEZ between January 1, 2016, and
27 the present and the purpose(s) of each email address (business, personal, etc.)

28

RESPONSE TO INTERROGATORY NO. 16:

msanchez@fdssolutionslimited.com; legal@fdssolutionslimited.com;
info@fdssolutionslimited.com

INTERROGATORY NO. 17:

Identify any relationship DEFENDANTS have, or have had, with respect to any of the following websites:

- www.campleasures.com
 - www.joincheckout.com
 - www.localesxfriends.com
 - www.safedatingcafe.com
 - www.oversinglelife.com
 - www.uberhorny.com
 - www.LSTFL.com
 - www.SFEGAF.com
 - www.VESGFE.com

RESPONSE TO INTERROGATORY NO. 17:

Responding Parties object to Interrogatory No. 17 as vague, ambiguous, overbroad, not calculated to lead to the discovery of relevant and admissible evidence, not proportional to the needs of the case, and violative of the right to privacy.

INTERROGATORY NO. 18:

Identify the date(s) each WEBSITE was launched.

RESPONSE TO INTERROGATORY NO. 18:

July 12, 2016.

1 **INTERROGATORY NO. 19:**

2 Identify the circumstances through which DEFENDANTS first became [sic]
3 aware of each of REFLEX, SEEKING ARRANGEMENT, and/or the TRADEMARK.
4

5 **RESPONSE TO INTERROGATORY NO. 19:**

6 Responding Parties became aware when they were served with this lawsuit. To
7 the extent “DEFENDANTS” is defined to include former employees of FDS and
8 Sanchez, Responding Parties have no knowledge of when (or if) those persons became
9 aware of REFLEX, SEEKING ARRANGEMENT, and/or the TRADEMARK.
10

11 **INTERROGATORY NO. 20:**

12 Identify every PERSON known to DEFENDANTS to be, at any time, a member
13 of SEEKING ARRANGEMENT.
14

15 **RESPONSE TO INTERROGATORY NO. 20:**

16 Responding Parties have no knowledge of any person who is a member of
17 SEEKING ARRANGEMENT. Responding Parties have no information as to what
18 their former employees, agents, or attorneys know about who is such a member.
19

20 **INTERROGATORY NO. 21:**

21 Identify every Internet domain name owned by DEFENDANTS from January 1,
22 2016, to the present.
23

24 **RESPONSE TO INTERROGATORY NO. 21:**

25 Responding Parties object to Interrogatory No. 21 as vague, ambiguous,
26 overbroad, not calculated to lead to the discovery of relevant and admissible evidence,
27 not proportional to the needs of the case, and violative of the right to privacy.
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1 **INTERROGATORY NO. 22:**

2 For all responses to REFLEX'S Requests for Admission that are not an
3 unqualified admission, state all facts supporting YOUR response.

4

5 **RESPONSE TO INTERROGATORY NO. 22:**

6 Request For Admission No. 1: Sanchez did not draft or send the PHISHING
7 EMAIL.

8 Request For Admission No. 2: The PHISHING EMAIL was not prepared at the
9 direction of Sanchez.

10 Request For Admission No. 3: The PHISHING EMAIL was not sent at the
11 direction of Sanchez.

12 Request For Admission No. 4: Prior to being served with this lawsuit, Sanchez
13 had no knowledge of the PHISHING EMAIL.

14 Request For Admission No. 6: Responding Parties have no knowledge of any
15 hyperlink contained in the PHISHING EMAIL.

16 Request For Admission No. 8: The PHISHING EMAIL was not prepared at the
17 direction of FDS.

18 Request For Admission No. 9: The PHISHING EMAIL was not sent at the
19 direction of FDS.

20 Request For Admission No. 10: Responding Parties have no information as to
21 whether they received any benefit from the PHISHING EMAIL.

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1 Dated: August 25, 2017
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GRODSKY & OLECKI LLP

Allen B. Grodsky

John Metzidis-Drennan

By:

Allen B. Grodsky

Attorneys for Defendants

Maria Del Mar Martinez Sanchez and
FDS Solutions Limited

VERIFICATION

I have read the foregoing **RESPONSES OF DEFENDANTS MARIA DEL MAR MARTINEZ SANCHEZ AND FDS SOLUTIONS LIMITED TO FIRST SET OF SPECIAL INTERROGATORIES** and know its contents.

CHECK APPLICABLE PARAGRAPH

- [X] I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

[x] I am () an Officer () a partner (x) a Director of a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. () I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. () The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, as to those matters I believe them to be true.

[] I am one of the attorneys for _____, a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on August 24, 2017, at Watford, England.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.


Maria de la mar Martinez Sanchez

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 2001 Wilshire Blvd., Suite 210, Santa Monica, California 90403.

On August 25, 2017, I served the following documents described as:
**RESPONSES OF DEFENDANTS MARIA DEL MAR MARTINEZ SANCHEZ
AND FDS SOLUTIONS LIMITED TO FIRST SET OF SPECIAL
INTERROGATORIES** on the parties in this action by serving:

Mark Smith, Esq. *Counsel*

Counsel for Plaintiff

Jacob Fonnesbeck, Esq.

Smith Correll, LLP

11766 Wilshire Blvd., Suite 1670

Los Angeles, CA 90025

FAX: (877) 730-5910

EMAIL: msmith@smithcorrell.com

jfonnesbeck@smithcorrell.com

(XX) By Mail: By placing a true copy thereof enclosed in sealed envelope addressed as above. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Santa Monica, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

() By Federal Express: I caused the envelope(s) to be delivered to the Federal Express depository at 2001 Wilshire Blvd., Santa Monica, California 90403, on _____, for delivery on the next-business-day basis to the offices of the addressee(s).

(XX) By E-Mail: On this same date, the above-named documents were successfully delivered via electronic transmission to the email addresses so listed above.

By Personal Service: I caused the above document to be delivered by hand to the offices of the addressee(s).

Executed on August 25, 2017 at Santa Monica, California.

FEDERAL I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Maria D. Wilson
Maria D. Wilson